

# **EXHIBIT 22**

**Steve Cole**

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**From:** Steve Cole  
**Sent:** Tuesday, December 14, 2021 10:32 AM  
**To:** Sharon Stiller; Maureen T. Bass  
**Cc:** McCarthy, Anna S.M.; jcalabrese@hselaw.com; Jeremy Sher; Amy Demanchick  
**Subject:** Donoghue v. Nostro  
**Attachments:** Amendment to Stipulated Protective Order.docx

Further to our discussion yesterday, please find a proposed amendment to the stipulated protective order which includes an attorneys-eyes-only designation. Please advise whether you will agree to this amendment.

Sharon/Maureen, if you will provide us with proof that credit reports had been pulled by PMC prior to May 1, 2019 for any of the loans for which Plaintiffs seek damages, we will expand our search of Supreme Lending's records to include any customers/loans not already covered by our production. This information was requested from Plaintiffs on December 17, 2020 through Supreme Lending's Document Requests, including but not limited to Nos. 6 and 106.

Steve

Steven E. Cole  
Managing Partner



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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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MICHAEL DONOGHUE and PREMIUM  
MORTGAGE CORPORATION,

Plaintiffs,

Case No. 6:20-cv-06100

-vs-

CYNTHIA NOSTRO, DYLAN RANDALL,  
DAVID POPHAM and EVERETT FINANCIAL,  
INC. d/b/a SUPREME LENDING,

Defendants.

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### **AMENDMENT TO STIPULATED PROTECTIVE ORDER**

The parties to this Amendment to Stipulated Protective Order have agreed to the terms of this Order; accordingly, it is ORDERED:

1. Paragraphs 3 and 4 of the Stipulated Protective Order dated October 29, 2020 (the “SPO,” Doc. # 28) are hereby amended to state that, in addition to and consistent with the terms set forth in the SPO, a party may designate documents or testimony as “ATTORNEYS’ EYES ONLY” if such documents or testimony is of such a private, sensitive, competitive, or proprietary nature that present disclosure to persons other than those identified in paragraph 2 below would reasonably be expected to cause irreparable harm or materially impair the legitimate competitive position or interests of the producing party.

2. Except with the prior written consent of the producing party or by order of the Court, documents or testimony designated as “ATTORNEYS’ EYES ONLY” shall not be furnished, shown, or disclosed to any person or entity except those identified in paragraph 5(b)(2)-(9) of the SPO.

3. This Amendment shall be made a part of the SPO. All other terms of the SPO governing documents or testimony designated as "CONFIDENTIAL" shall apply to documents or testimony designated as "ATTORNEYS' EYES ONLY."

**WE SO MOVE  
and agree to abide by the  
terms of this Order**

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Sharon P. Stiller, Esq.  
ABRAMS, FENSTERMAN,  
FENSTERMAN, EISMAN,  
FORMATO, FERRARA, WOLF  
& CARONE, LLP  
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**WE SO MOVE  
and agree to abide by the  
terms of this Order**

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Jeffrey J. Calabrese, Esq.  
HARTER, SECREST & EMERY  
*Attorneys for Defendants: Cynthia  
Nostro, Dylan Randall and  
David Popham*  
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**SO ORDERED.**

Dated: December \_\_, 2021

**WE SO MOVE  
and agree to abide by the  
terms of this Order**

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Jeremy M. Sher, Esq.  
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HON. MARK W. PEDERSEN

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